

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Telecom Business Solution, LLC, *et al.*,

Petitioners,

v.

Terra Towers Corp., *et al.*,

Respondents.

Civil Action No.: 1:22-cv-01761

Judge Lewis A. Kaplan

Magistrate Judge Robert W.
Lehrburger

DECLARATION OF JORGE HERNANDEZ

Pursuant to 28 U.S.C. § 1746, I, Jorge Hernandez, declare the following:

1. Terra Towers Corp. (“Terra”), TBS Management S.A. (“TBS”), and DT Holdings Inc. (“DT Holdings”) have requested that I make this declaration.

2. I am familiar with the Memorandum Opinion (the “Opinion”) issued by the District Court on April 22, 2025. This declaration is in fulfillment of Sections 5.2 and 6.2, which are on pages 47 and 48 of the Opinion.

3. I am not a lawyer. This declaration does not contain any opinion by me as to the legal effects of any issue in dispute.

4. I make this declaration without waiving any right that I may have, including the right to challenge any service purportedly made on me or anyone in my name.

5. By making this declaration, I am not submitting myself to the jurisdiction of this Court. I intend to move to quash the service purportedly made on me. I do not live in the United States. My permanent abode is in Guatemala.

6. I do not own Terra, TBS, or DT Holdings. I have never owned these entities.

7. I have seen communications indicating that the directors appointed by the Class A Shareholders in Continental Towers Latam Holdings, Ltd. (the “Company”) agreed to a resolution with the Class B Shareholders in the Company that direct the subsidiaries of the Company to dismiss the El Salvador Action and vacate the relief granted in the BVI Actions.

8. I do not control the actions of Ms. Granillo, who is an employee of Continental Towers El Salvador, Ltda. Ms. Granillo is not an employee of DT Holdings or its subsidiaries.

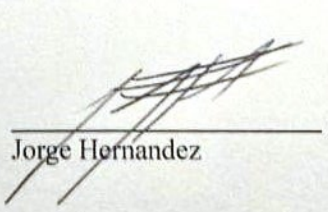
9. I do not control the actions of Mr. Ortiz, who is an employee of Continental Towers de Guatemala, Ltd. Mr. Ortiz is not and has never been an employee of DT Holdings or its subsidiaries. Although I am not familiar with the day-to-day activities of Mr. Ortiz or the company that employs him, I do not understand that he or his employer has anything to do with dismissing the El Salvador Action or the BVI Actions.

10. I have seen a communication from Ms. Granillo informing that the relevant steps will be taken to dismiss the El Salvador Action.

11. I do not control the actions of Ms. Merino or Mr. Garzaro. Both are employees of Telecom Business Solutions S.R.L., which is a subsidiary of the Company. They are not employees of DT Holdings or its subsidiaries.

12. I have seen a communication signed by both of them that indicates that they intend to take all steps necessary to comply with the Opinion.

Dated: May 5, 2025



Jorge Hernandez